

U.S. Department
of Transportation

**United States
Coast Guard**



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16711

7 December 1998

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: FLOATING PRODUCTION STORAGE AND OFFLOADING (FPSO)
CERTIFICATION

1. Enclosure (1) is forwarded for your information and pertains to a recent query regarding the standards FPSOs should be inspected to prior to issuing a Letter of Compliance.
2. Questions on this matter may be addressed to LCDR Bill Daughdrill at (504) 589-6193.

A handwritten signature in black ink, appearing to read "M. J. Brown".

M. J. BROWN

By direction

Encl: (1) COMDT (G- MOC-2) ltr 16711 of 16 Nov 98

Distribution: All Eighth District MSOs, MSDs and MSU



16711

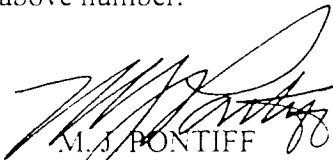
NOV 16 1998

From: Commandant (G-MOC)
To: Commanding Officer, Marine Safety Office, Morgan City, LA

Subj: DEEPWATER PATHFINDER CERTIFICATION

Ref: (a) Your letter 16711/DEEPWATER PATHFINDER dated 15Sep98
(b) My letter 16711 dated 30Mar98
(c) My letter 16711/39 dated 20Feb97

1. This is in response to reference (a). There has been no shift in policy regarding the applicability of MODU and tank vessel rules to Floating Production Storage and Offloading (FPSO) systems as articulated in references (b) and (c). FPSOs must be issued Letters of Compliance (LOC) due to their status as MODUs and must comply with 46 CFR Subchapter D due to the carriage of oil as cargo as defined in that subchapter.
2. Since the subject vessel is classed as a MODU and holds a valid IMO MODU Code Certificate from the flag administration, the Coast Guard will honor that certificate. The ISM Code is not applicable to this vessel until 2002 for that reason.
3. The well test fluids are considered cargo as it is a logical assumption that the product consists of a liquid blend of hydrocarbons (crude oil) and possibly some drilling fluids and water based upon the stated objective of the FPSO to prove commercial viability of an oil well. Since the stored crude oil is cargo, the cargo block on the Deepwater Pathfinder is subject to the tank vessel regulations found in 46 CFR Subchapter D as well as 33 CFR Parts 155 and 157. Additionally, if the vessel intends to operate within 23 miles of shore the provisions of the Clean Air Act are, also, applicable.
4. Should you have any further questions regarding this matter, please feel free to contact LT James Robertson of my staff at the above number.


M.J. PONTIFF
By direction

Copy: CGD8(m)
MSO Port Arthur
MSU Galveston